

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA)**

IN RE:)	
)	
MIN SIK KANG)	Case No. 10-18839-RGM
MAN SUN KANG)	Jointly Administered with
)	Case No. 11-10200
Debtors.)	Chapter 11

MOTION FOR LEAVE TO FILE A PROOF OF CLAIM AFTER FILING DEADLINE

COMES NOW Yeon Han, Kyong Chun Chu, Jack Kim, Il Hwan Kim, Ki Yoon, Sun Kyung Lim and 7 Investment, LLC, interested parties in this proceeding (the “Movants”), by and through Counsel, and move this Court for leave to file a proof of claim after the filing deadline in the above styled matter and states as follows:

1. Min Sik Kang and Man Sun Kang (“Debtors”) filed a voluntary petition for bankruptcy under Chapter 11 in the United States Bankruptcy Court, Eastern District of Virginia (Alexandria Division) on October 19, 2010.

2. The Movants are members of 7 Investment, LLC (“7 Investment”), which has an equitable interest in several business entities owned by the Debtors, namely, Grand Mart, Inc. referred to herein as “Alexandria Grand Mart;” Grand Mart International Food, LLC, referred to herein as “Sterling Grand Mart;” and Lucky World - Gaithersburg, Inc. referred to herein as “Lucky World.”

Thomas Repczynski, Esq.
Offit Kurman
4800 Montgomery Lane, Suite 900
Bethesda, MD 20814
(240) 507-1713
Counsel for Movants

3. Some or all of the Movants purchased interests in businesses owned by the Debtors.

4. The Debtors filed their petition and schedules but failed to list the Movants as creditors. Therefore, the Movants did not receive timely notice of the Debtors' bankruptcy filing and were unable to file their proof of claims before the February 22, 2011 deadline.

5. The Examiner appointed in this case seeks to avoid transfers by the Debtors to the Movants.

6. The Movants should have received timely notice of the bankruptcy petition but did not and are therefore requesting that the court treat the Movants' proofs of claim as timely filed.

WHEREFORE, the Movants respectfully request that this Court grant the Movants' requested relief to allow the filing of proofs of claim by Yeon Han, Kyong Chun Chu, Jack Kim, Il Hwan Kim, Ki Yoon, Sun Kyung Lim and 7 Investment, LLC; deem such filings as timely filed; and grant any other relief this court finds just and proper.

Date: November 18, 2011

Respectfully submitted,

OFFIT KURMAN, P.A.

/s/ Thomas Repczynski

Thomas Repczynski, Esq. (VSB No. 39967)
4800 Montgomery Lane, Suite 900
Bethesda, MD 20814
(240) 507-1713
Counsel for Movants

Thomas Repczynski, Esq.
Offit Kurman
4800 Montgomery Lane, Suite 900
Bethesda, MD 20814
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Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2011, to the creditors on the Court's official mailing matrix and, to the extent that the following persons were not served electronically via the CM/ECF system, a copy of the foregoing was mailed, first class mail, postage prepaid, to the following:

Min Sik Kang
Man Sun Kang
9378 Colbert Court
Fairfax, VA 22032

Office of the U.S. Trustee
115 South Union Street, Suite 210
Alexandria, VA 22314

Michael Tully Driscoll, Esquire
Office of the U.S. Trustee
115 South Union Street, Suite 210
Alexandria, Virginia 22314

Unsecured Creditors Committee
c/o Brad Englander, Esq.
Whiteford, Taylor & Preston
3190 Fairview Park Drive, Suite 300
Falls Church, VA 22042

Linda Regenhardt, Esq.
8500 Leesburg Pike, Suite 400
Vienna, VA 22182

Jack Kim
4812 Cross Meadow Place
Chantilly, VA 20151

Yeon Han
1014 Eaton Drive
McLean, VA 22102

Kyong Chu
4821 Autumn Glory Way
Chantilly, VA 20151

Il Hwan Kim
4716 Benjamin Cross Court
Chantilly, VA 20151

Ki Yoon
5749 Solheim Cup Drive
Haymarket, VA 20169

Sun Kyung Lim
13676 Sweet Woodruff Lane
Centreville, VA 20120

/s/ Thomas Repczynski
Thomas Repczynski, Esq.

Thomas Repczynski, Esq.
Offit Kurman
4800 Montgomery Lane, Suite 900
Bethesda, MD 20814
(240) 507-1713
Counsel for Movants